

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

---

AMERICAN INSURANCE COMPANY, a )	Court File No. 08-013 (DSD/JJG)
Nebraska corporation, )	
) )	
Plaintiff, ) )	<b>ST. JUDE MEDICAL, INC.'S</b>
) )	<b>MOTION TO ADD PARTY</b>
v. ) )	
) )	
ST. JUDE MEDICAL, INC., a Minnesota ) )	
corporation, ) )	
) )	
Defendant. ) )	

---

Defendant, St. Jude Medical, Inc., hereby moves this Court pursuant to Federal Rules of Civil Procedure 19, 20, and 21 to add Willis of Minnesota, Inc., formerly known as Willis Corroon Corporation of Minnesota ("Willis"), as a defendant in the above-captioned matter, whereupon St. Jude Medical, Inc., would file the attached Answer, Counterclaims, and Cross-Claims against Willis. This motion is based on the entire file in this case, the legal memoranda and affidavits to be submitted in support of this motion, and the arguments of counsel.

DATED: September 22, 2008.

LINDQUIST & VENNUM P.L.L.P.

By: s/ Jonathan M. Bye  
Jonathan M. Bye (#148830)  
jbye@lindquist.com  
Thomas C. Mielenhausen (#160325)  
tmielenhausen@lindquist.com  
Christopher L. Lynch (# 0284154)  
clynch@lindquist.com  
Meghan M. Elliott (#0318759)  
melliott@lindquist.com  
4200 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402

Tel: (612) 371-3211  
Fax: (612) 371-3207

**ATTORNEYS FOR ST. JUDE MEDICAL,  
INC.**